



Genova Burns LLC
494 Broad Street, Newark, NJ 07102
Tel: 973.533.0777 Fax: 973.533.1112
Web: www.genovaburns.com

Harris S. Freier, Esq.
Partner
Member of NJ, NY, DC and CT Bars
hfreier@genovaburns.com
Direct: 973-230-2079

September 22, 2023

VIA ECF

Honorable Michael A. Hammer, U.S.M.J.
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Courtroom MLK 4C
Newark, NJ 07101

Re: ADP, Inc. v. Jefferson Given,
Civil Action No. 22-4213 (MCA) (MAH)

Dear Judge Hammer:

Pursuant to the Court's September 18, 2023 Amended Scheduling Order (ECF No. 37), the parties write jointly to provide the Court a response "indicating whether they intend to pursue settlement efforts with the Undersigned or an outside mediator." The Parties have agreed to pursue private mediation and have reached out to mediator Sheryl Mintz Goski, Esq. to schedule the mediation and will attempt to conduct the mediation by the end of the year (most likely December of 2023) subject to Ms. Goski's availability.

Respectfully submitted,

GENOVA BURNS LLC

/s/ Harris S. Freier

HARRIS S. FREIER

CC: All Counsel of Record via ECF